



Glenn Meeks  
Central Valley Regional Water Board  
[Glenn.Meeks@waterboards.ca.gov](mailto:Glenn.Meeks@waterboards.ca.gov)

**SUBJECT: COMMENTS ON FINAL DRAFT CENTRAL VALLEY REGION 5 SNMP**

Dear Mr. Meeks:

In follow up to the Notice of Opportunity to Comment on the Salt and Nitrate Management Plan (SNMP) for the Central Valley, Luhdorff & Scalmanini, Consulting Engineers (LSCE) has some comments for consideration. Since 2009, LSCE has greatly appreciated the opportunity to have contributed to the technical work, especially the groundwater-related work, in support of the SNMP. Our comments are focused on some clarifications and completeness of reference citations, primarily in the Executive Summary but also in a few other locations.

**Executive Summary**

**Pg. ES-6:** This page describes the Delta Region. A somewhat clearer description of the Delta Region and its relationship to the Central Valley Region 5 is provided on page ES-9. Suggest relooking at the language on page ES-6 for consistency and clarity.

**Figure ES-2:** The location of the word “Delta” on this figure seems awkward. Suggest relooking at this in coordination with the comment above re language describing the Delta Region on pages ES-6 and ES-9.

**Figure ES-3:** The view shown in this figure is consistent with its title. However, it seems like there is not a clear discussion of the total number of basins/subbasins occurring within all of Region 5.

**Table ES-9:** In this table and another table in Section 4, where key supporting references to the SNMP are cited, it would be appropriate to provide the full reference citation on first mention of the reference. For example, under Technical Studies and Alta Irrigation District, it would be appropriate to provide the full citation as:

Larry Walker Associates, Luhdorff & Scalmanini Consulting Engineers, PlanTierra, Formation Environmental, and G. Kourakos. 2016. *Management Zone Archetype Analysis Report: Alta Irrigation District*. Report prepared for CV-SALTS. July 2016.

**Table ES-10:** In this table and also the table in Section 4, it would be appropriate to provide the full reference citation on first mention of the reference. Under Salt and Nutrient Source Identification, it would be appropriate to provide the full citation as:

Larry Walker Associates, Luhdorff & Scalmanini Consulting Engineers, Kennedy/Jenks, PlanTierra, Systech Water Resources, and Carollo Engineers. 2013. *Central Valley Salinity Alternatives for Long-term Sustainability (CV-SALTS): Initial Concept Model (ICM) Technical Services. Tasks 7 and 8 – Salt and Nitrate Analysis for the Central Valley Floor and a Focused Analysis of Modesto and Kings Subregions*. Report prepared for CV-SALTS. December 3, 2013.

**Pg. ES-55-56:** The Executive Summary references are missing the above two references.

## Section 2

**Pg. 2-13 and 2-18:** Figures 2-3 and 2-4 have a label for the Sacramento River Hydrologic Region but the figure does not show the entire region.

## Section 3

**Pg. 3-1:** This section draws heavily on the ICM technical work. While manuscripts in journals may not provide full reference details, it would be appropriate at the first mention in this section of the ICM document to provide a full citation:

Larry Walker Associates, Luhdorff & Scalmanini Consulting Engineers, Kennedy/Jenks, PlanTierra, Systech Water Resources, and Carollo Engineers. 2013. *Central Valley Salinity Alternatives for Long-term Sustainability (CV-SALTS): Initial Concept Model (ICM) Technical Services. Tasks 7 and 8 – Salt and Nitrate Analysis for the Central Valley Floor and a Focused Analysis of Modesto and Kings Subregions*. Report prepared for CV-SALTS. December 3, 2013.

## Section 4

**Table 4-3:** In this table, where key supporting references to the SNMP are cited, it would be appropriate to provide the full reference citation on first mention of the reference. For example, under salt and nutrient source identification, it would be appropriate to provide full citations as:

Larry Walker Associates, Luhdorff & Scalmanini Consulting Engineers, Kennedy/Jenks, PlanTierra, Systech Water Resources, and Carollo Engineers. 2013. *Central Valley Salinity Alternatives for Long-term Sustainability (CV-SALTS): Initial Concept Model (ICM) Technical Services. Tasks 7 and 8 – Salt and Nitrate Analysis for the Central Valley Floor and a Focused Analysis of Modesto and Kings Subregions*. Report prepared for CV-SALTS. December 3, 2013.

Larry Walker Associates, Luhdorff & Scalmanini Consulting Engineers, PlanTierra, Formation Environmental, and G. Kourakos. 2016. *Management Zone Archetype Analysis Report: Alta Irrigation District*. Report prepared for CV-SALTS. July 2016.

We appreciate consideration of our comments. Please call or email if there are any questions.

Sincerely,

LUHDORFF & SCALMANINI,  
CONSULTING ENGINEERS



Vicki Kretsinger Grabert  
President